

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ZACHARY KNOTTS and LINDSAY KNOTTS,)	
)	
Plaintiffs,)	Case No. 5:25-CV-01120-JRA
)	
v.)	JUDGE JOHN R. ADAMS
)	
CITY OF CUYAHOGA FALLS, DYLAN PARATORE, in his individual and official capacities, and BRADFORD DOBNEY in his individual and official capacities,)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

AND NOW, come Defendants City of Cuyahoga Falls, Dylan Paratore, and Bradford Dobney, by and through their counsel, Dickie, McCamey & Chilcote, P.C., and file the within Consent Motion for Extension of Time to Answer or Otherwise Respond to Plaintiffs' Complaint, stating as follows:

1. This matter arises out of a constitutional challenge to a municipal ordinance enacted by the City of Cuyahoga Falls.
2. In addition to a Complaint (ECF No. 1), Plaintiffs filed a Motion for Preliminary Injunction. (ECF No. 3).
3. Defendant City of Cuyahoga Falls was served on June 3, 2025 (ECF No. 6) and counsel has entered their appearance on behalf of all Defendants.
4. Defendants Dylan Paratore and Bradford Dobney acknowledge service of the Complaint as well.

5. On June 20, 2025, Defendants filed their Opposition to Plaintiffs' Motion for Preliminary Injunction. (ECF No. 12).

6. Defendant City of Cuyahoga Falls' deadline to answer or otherwise respond to Plaintiffs' Complaint is currently set for June 24, 2025.

7. In order to coordinate the dates for responses for all Defendants to answer or otherwise respond to the Complaint, the Defendants request an extension of time to answer or otherwise respond to the Complaint until July 8, 2025.

8. This case remains in its early stages, and the requested extension will not unduly delay the proceedings, especially considering that the Defendants have timely filed a response to Plaintiffs' Motion for Preliminary Injunction.

9. Plaintiffs' counsel has consented to this motion and the requested extension of time until July 8, 2025.

WHEREFORE, Defendants City of Cuyahoga Falls, Dylan Paratore, and Bradford Dobney, respectfully request that this Honorable Court enter an Order granting the within motion.

Respectfully submitted,

DICKIE, MCCAMEY & CHILCOTE, P.C.

By: /s/ Paul A. Roman, Jr.

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**Attorneys for Defendants
City of Cuyahoga Falls, Dylan
Paratore, and Bradford Dobney**

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2025, I filed the foregoing **Consent Motion for Extension of Time to Answer or Otherwise Respond to Plaintiffs' Complaint** with the Clerk using the CM/ECF System, which will send notification of such filing to all counsel of record.

DICKIE, McCAMEY & CHILCOTE, P.C.

By: /s/ Paul A. Roman, Jr. _____
Paul A. Roman, Jr.

**Attorneys for Defendants
City of Cuyahoga Falls, Dylan
Paratore, and Bradford Dobney**